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Reply to:

Hartford

MUR 4808

September 10, 1998

Via Overnight Mail
Office of the General Counsel
Federal Elections Commission
999 E Street NW
Washington, D.C. 20463

RE: Complaint of John B. Larson and Larson for Congress

Dear General Counsel:

This office represents John B. Larson of East Hartford, Connecticut and Larson for Congress a federal candidate committee advocating the election of John B. Larson as U.S. Representative for the First District of Connecticut (hereinafter "Larson").

Please accept this letter and the accompanying affidavit as my clients' complaint against Miles Rapoport of West Hartford, Connecticut and Rapoport for the First, a federal candidate committee advocating the election of Miles Rapoport as U.S. Representative for the First District of Connecticut (hereinafter "Mr. Rapoport"). Mr. Larson and Mr. Rapoport are two of the four candidates facing each other in a Democratic primary to be held on September 15, 1998. This complaint is prompted by a specific false statement about Mr. Larson being circulated by Mr. Rapoport and persons acting on his behalf.

Mr. Larson served until 1994 as President Pro Tempore of

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the Connecticut State Senate. During his service in the legislature, Mr. Larson was a noted advocate for issues affecting Connecticut senior citizens. For many years, an issue of particular concern for Connecticut seniors was a program called ConnPACE, a state program designed to insure seniors affordable access to prescription medicines. Mr. Larson was not only an unwavering supporter of the ConnPACE program but was, perhaps, its most noteworthy champion and was instrumental in protecting the program. Indeed, Mr. Larson's advocacy for seniors was so powerful that a Connecticut organization known as United Seniors in Action ("USA") enthusiastically and formally honored him for his activities. As a consequence of his years of devotion to seniors, Mr. Larson enjoys overwhelming support from seniors in the upcoming primary.

With this in mind, Mr. Rapoport has commenced a false and illegal campaign to convey the exact opposite impression to primary voters. Specifically, Mr. Rapoport has allowed to be published on his behalf, literature blatantly and falsely accusing Mr. Larson of opposing prescription drug programs for seniors. Exhibit "A". This information was not only published with knowledge or reckless disregard for the honesty of the statement but it, along with other pieces of literature published by Mr. Rapoport, has been published illegally.

Exhibit "A" was either directly paid for by the AFL-CIO or was paid for by a political committee known as "Labor '98". Mr. Larson hereby alleges that there has been extensive coordination between these entities and Mr. Rapoport, depriving this piece of any purported status as an "independent expenditure." If the advertisement was paid for by Labor 98, Mr. Rapoport has illegally failed to report it as a contribution. If the advertisement was paid for by AFL-CIO, the expenditure is illegal because it was not paid for by a political committee. Exhibit "A" is part of ongoing federal election law violations on the part of Mr. Rapoport. Specifically, within the last few days, Mr. Rapoport has coordinated the release of a second illegal advertisement attached as Exhibit "B". Exhibit "B" claims on its face to be paid for by "Connecticut AFL-CIO." The extensive coordination between this entity and Mr. Rapoport, deprives this piece as well of any purported

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status as an "independent expenditure." Because it was paid for directly by the entity it is an illegal expenditure.

Mr. Rapoport should be held responsible for recklessly flaunting our nation's campaign finance laws. While apparently enjoying the benefits of independent expenditures, Mr. Rapoport has in fact urged these expenditures, discussed their subject matter and timing with the senders and maintained regular contacts in person and by telephone with the organizations paying for the advertising. By agreement and coordination between Mr. Rapoport and the organizations, officers and members of the organizations are regularly working at Mr. Rapoport's headquarters, appear at campaign events, and contribute money and time to his campaign. In addition, the political committees of the organizations superficially claiming to be making "independent" expenditures have made substantial and repeated financial contributions to Mr. Rapoport's committee. Finally, it is believed that at Mr. Rapoport's request, these organizations have also unwittingly made illegal contributions to his campaign by using telephones and facilities owned by them (not their PAC's) for the purpose of advocating Mr. Rapoport's election.

My client wishes to emphasize that Mr. Rapoport has only himself to blame for his apparent indifference to the rules of honest campaigning. Mr. Rapoport is currently Connecticut's Secretary of State, and is charged with executing our state's campaign finance laws. No one should know the law better than him, forcing the conclusion that he has misled innocent third parties into supporting a false and illegal campaign to win election to office.

Please consider this request an urgent appeal for action to remedy these violations.

Very truly yours,


Thomas G. Moukawsher

TGM:tba

AFFIDAVIT

STATE OF CONNECTICUT }
 } SS: EAST HARTFORD
COUNTY OF HARTFORD }

The undersigned being duly sworn does hereby depose and say:

1. I am over the age of eighteen and believe in the sanctity of an oath.

2. I am a candidate for Congress in the First District of Connecticut.

3. On information and belief I make the following allegations against Miles Rapoport and Rapoport for the First:

4. Mr. Rapoport has allowed to be published on his behalf, literature blatantly and falsely accusing me of opposing prescription drug programs for seniors. Exhibit "A". This information was not only published with knowledge or reckless disregard for the honesty of the statement but it, along with other pieces of literature published by Mr. Rapoport has been published illegally.

5. First, with respect to Exhibit "A", Mr. Rapoport has not reported this expenditure as a contribution to his campaign. Nonetheless, Mr. Rapoport has extensively coordinated his campaign efforts including the publication of this piece, with the sponsor of the piece, "Labor 98". Second, Exhibit "A" is part of ongoing federal election law violations on the part of Mr. Rapoport. Specifically, within the last few days, Mr. Rapoport has coordinated the release of an illegal mailing attached as Exhibit "B".

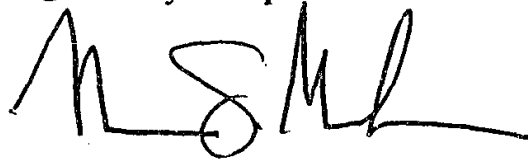
6. Exhibit "B" claims on its face to be paid for by "Connecticut AFL-CIO." I believe that there has been extensive coordination between this entity and Mr. Rapoport, depriving this piece of any purported status as an "independent expenditure." I further believe that the piece constitutes an illegal expenditure which Mr. Rapoport is responsible for because of the coordination and because the piece was not paid for by a political committee.

7. Mr. Rapoport should be held responsible for recklessly flaunting our nation's campaign finance laws. While apparently enjoying the benefits of independent expenditures, Mr. Rapoport has in fact urged these expenditures, discussed their subject matter and timing with the senders and maintained regular contacts in person and by telephone with the organizations paying for the advertising. By agreement and coordination between Mr. Rapoport and the organizations, officers and members of the organizations are regularly working at Mr. Rapoport's headquarters, appear at campaign events, contribute money and time to his campaign. In addition, the political committees of the organizations superficially claiming to be making "independent" expenditures have made substantial and repeated financial contributions to Mr. Rapoport's committee. Finally, it is believed that at Mr. Rapoport's request, these organizations have also unwittingly made illegal contributions to his campaign by using telephones and facilities owned by them (not their PAC's) for the purpose of advocating Mr. Rapoport's election.

8. Please consider this request an urgent appeal for action to remedy these violations.


John B. Larson

Subscribed and sworn to before me this 10th day of September 1998.


Commissioner of Superior Court

Who's On Our Side?

Miles Rapoport has been a strong advocate for working families as a long time State Representative and most recently as Connecticut's Secretary of State. Miles is committed to revitalizing the Hartford area and will work to improve health care, education, job security and pay equity for the residents of the First District.

MILES RAPOPORT



JOHN LARSON



☒ Fought to protect injured workers from drastic benefit cuts

☒ Supports protecting Social Security and Medicare. Has fought to ensure that seniors were guaranteed prescription drugs.

☒ Supported attempts to give state workers a pay raise — a raise they were guaranteed in union contracts.

☐ Voted to cut benefits to workers who were injured or lost their lives on the job. (1993 House Bill 7172)

☐ Opposed efforts to give seniors needed prescription drugs.

☐ Voted to deny workers their guaranteed pay raises. (1993 House Bill 7172)

Miles Rapoport is on our side.

98

Vote September 15

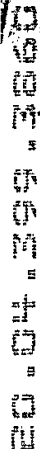
Connecticut AFL-CIO

09/14/94

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Investments

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Exhibit "B"



150 million Americans have their health care provided by Health Maintenance Organizations (HMOs), group programs created to help businesses hold the line on health care costs.

Something has to be done to rein in the HMOs.

HMOs are great if you have a cold or other common illness, but an increasing number of people are worried about their health coverage when accidents or major illnesses occur.

Just about everyone who has elderly parents, sick kids or a health problem themselves has found you don't just fight the disease these days, you have to fight your HMO too—just to get the treatment you need.

Miles Rapoport Will Put Connecticut Families First—Not HMOs.

Miles Rapoport is a real fighter for families who want to put patients back in charge of their medical care. Miles has been a strong advocate of a Patient's Bill of Rights that gives families the right to see the doctor of their choice.

As your Congressman, Miles Rapoport will continue the fight for:

- HMO Liability for Malpractice to hold them legally responsible
- Quality of Care that ensures decisions by frontline doctors—not behind the scenes HMO bureaucrats.
- Expanded Choice of Doctors.
- Right to Appeal Denials of Needed Care.
- More Access to Medical Specialists.
- Increased Protections for Women.
- Access to Emergency Care.
- Elimination of "Gag Rules" HMOs use to prevent doctors from discussing treatment options.

"Patients and their doctors—not HMO administrators should be making medical decisions. Every American should be able to get care from the doctor of their choice, and managed care plans should be responsible for malpractice. Now is the time for Congress to pass a real Patients' Bill of Rights."

—Miles S. Rapoport

Make Your Voice Heard.
Vote Miles Rapoport in the Democratic primary for Congress on Tuesday, September 15.
A Real Fighter for Families.



Fighting for families and supporting patients' rights is just one reason the men and women of the AFL-CIO have recommended Miles Rapoport for Congress in Connecticut's First District.

The AFL-CIO urges you to vote. For more information on issues important to working families, visit our website at www.aflcio.org.

